IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ICONTROL NETWORKS, INC., a Delaware Corporation, Plaintiff, v. ZONOFF INC., a Delaware Corporation, Defendant.	Civil Action No. 1:15-cv-1109 GMS

ZONOFF INC.'S ANSWER TO ICONTROL NETWORKS, INC.'S COMPLAINT FOR PATENT INFRINGEMENT AND DEMAND FOR JURY TRIAL

Defendant Zonoff Inc. ("Zonoff") responds to Icontrol Networks, Inc.'s ("Icontrol") Complaint in accordance with the numbered paragraphs thereof, as follows:

ANSWER

1. Admitted on information and belief.

2. Denied as stated. Zonoff is a Delaware corporation having its principal place of business at 1200 Atwater Drive, Suite 210, Malvern, Pennsylvania 19355.

3. The first and third sentences of this paragraph are admitted. Zonoff lacks knowledge or information sufficient to form a belief about the truth of the second sentence of this paragraph and accordingly it is deemed denied.

4. The first and third sentences of this paragraph are admitted. Zonoff lacks knowledge or information sufficient to form a belief about the truth of the second sentence of this paragraph and accordingly it is deemed denied.

5. The first and third sentences of this paragraph are admitted. Zonoff lacks knowledge or information sufficient to form a belief about the truth of the second sentence of this paragraph and accordingly it is deemed denied.

6. Denied.

7. Denied as a legal conclusion.

8. Denied as a legal conclusion.

9. Denied as a legal conclusion.

10. Denied.

11. Denied.

12. Admitted only that Zonoff issued a December 3, 2014 press release. The December 3, 2014 press release speaks for itself and any characterization thereof is denied. The remainder of this paragraph is denied.

13. Zonoff lacks knowledge or information sufficient to form a belief about the truth of the first, second, third and fourth sentences of this paragraph and accordingly they are deemed denied. The remainder of the paragraph is denied.

14. Denied.

15. Denied.

16. The first sentence of this paragraph is vague and unclear such that Zonoff is unable to form a belief about the truth of the allegation and accordingly it is deemed denied. The second sentence of this paragraph is denied.

17. The first sentence of this paragraph is admitted. The complaint filed in *Icontrol Networks, Inc. v. Zonoff, Inc.*, Case No. 1:14-cv-01199-GMS (D. Del.), speaks for itself and any characterization thereof is denied. The remainder of the paragraph is denied.

18. Denied.

19. Denied.

20. Denied.

21. Denied.

22. Denied.

23. The first sentence of this paragraph is vague and unclear such that Zonoff is unable to form a belief about the truth of the allegation and accordingly it is deemed denied. The second sentence is admitted on information and belief.

24. Denied.

25. Denied.

26. Zonoff incorporates by reference the averments of paragraphs 1 through 25 above.

27. Zonoff lacks knowledge or information sufficient to form a belief about the truth of this allegation and accordingly it is deemed denied.

28. Denied.

29. Denied.

30. Denied.

31. Denied.

32. Denied.

33. Denied.

34. Denied.

35. Zonoff incorporates by reference the averments of paragraphs 1 through 34 above.

36. Zonoff lacks knowledge or information sufficient to form a belief about the truth of this allegation and accordingly it is deemed denied.

37. Denied.

38. Denied.

39. Denied.

40. Denied.

41. Denied.

42. Denied.

43. Denied.

44. Zonoff incorporates by reference the averments of paragraphs 1 through 43 above.

45. Zonoff lacks knowledge or information sufficient to form a belief about the truth of this allegation and accordingly it is deemed denied.

46. Denied.

47. Denied.

48. Denied.

49. Denied.

50. Denied.

51. Denied.

52. Denied.

ADDITIONAL DEFENSES

1. Zonoff has not directly or indirectly infringed any valid and enforceable claim of the patents-in-suit, either literally or under the doctrine of equivalents.

2. The asserted claims of the patents-in-suit are invalid for failure to comply with the statutory requirements for patentability and validity set forth in Title 35 of the United States Code, including, but not limited to, one or more of §§ 101, 102, 103 and/or 112.

3. Plaintiff's claims are barred or otherwise limited by 35 U.S.C. § 287.

4. Plaintiff's claims are barred or otherwise limited by 35 U.S.C. § 288.

WHEREFORE, Zonoff respectfully requests that the Complaint be dismissed with prejudice, that Zonoff be awarded its costs, and that the Court grant Zonoff such other relief as the Court deems appropriate.

Dated: June 20, 2016

/s/ *Jody C. Barillare*

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